

# EXHIBIT A

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES AND EXCHANGE COMMISSION,

**Plaintiff,**

- against -

**RIPPLE LABS, INC., BRADLEY GARLINGHOUSE,  
and CHRISTIAN A. LARSEN,**

**Defendants.**

**20 Civ. 10832 (AT) (SN)**

### ECF Case

## DECLARATION OF MATTHEW ESTABROOK

I, Matthew Estabrook, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I was Counsel to Commissioner Elad L. Roisman at the Securities and Exchange Commission (“SEC”) from September 2018 to January 2022. Before that I was Counsel to SEC Commissioner Michael S. Piwowar from February 2018 to July 2018. I also served in positions in the SEC’s Division of Enforcement from August 2010 to January 2018 and from July to August 2018.

2. In October 2018, I had a phone call with Andrew Ceresney, an attorney at Debevoise & Plimpton LLP, about setting up a meeting between Bradley Garlinghouse, the Chief Executive Officer of Ripple Labs, Inc. (“Ripple”), and Commissioner Roisman. During that call, Mr. Ceresney told me that the SEC’s Division of Enforcement had an open investigation regarding XRP, a digital asset that Ripple sold. Mr. Ceresney told me that the meeting between Mr. Garlinghouse and Commissioner Roisman would not relate to that investigation.

3. On or about November 9, 2018, I attended a meeting between Commissioner Roisman and Mr. Garlinghouse, and I took notes of certain statements made at that meeting. My notes reflect the matters discussed at the meeting that I believed were important and that could relate to future Commission decisions. My notes do not reflect everything that was said at the meeting.

4. At the time of the meeting, I believed the Commission could propose a rule regarding the regulation of digital asset offerings, and I was seeking information that would allow me to provide advice to Commissioner Roisman on such a proposal.

5. My last day at the SEC was January 14, 2022. In preparing my files for my departure from the SEC during the week of January 10, 2022, I located notes I had taken of the November 9, 2018 meeting with Mr. Garlinghouse. Though I had previously searched my files for any such notes, I did not locate the notes until January 2022, at which time I promptly contacted staff in the Division of Enforcement.

I declare under penalty of perjury that the foregoing is true and correct. Executed on February 24, 2022 in ALEXANDRIA, VA.



Matthew Estabrook